



**THE CITY OF NEW YORK
LAW DEPARTMENT**

Muriel Goode-Trufant
Acting Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

ELISHEVA L. ROSEN
Phone: (212) 356-3522
Fax: (212) 356-2089
E-mail: erosen@law.nyc.gov

June 17, 2024

Via ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Simone Evans v. City Of New York; New York City School Construction
Authority; Peter Mule; Amtex Systems Inc.; Jimmy Ahn; Neramati Jagdeo;
and Joseph Scalisi sued in their individual and official capacity
Civil Action No.: 24-CV-3298

Dear Justice Abrams:

I am an Assistant Corporation Counsel in the Office of office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, City of New York ("City") and New York City School Construction Authority ("NYCSCA") (collectively, "City Defendants") in the above-referenced matter. I write to respectfully request a sixty (60) day extension of time, from June 27, 2024 to August 26, 2024, for City Defendants to respond to the Complaint.¹ This is City Defendants' first request for an extension of time. Plaintiff's counsel consents to this request.

The extension of time is requested so this Office may adequately investigate the allegations made in the Complaint and prepare a proper response. An extended request is necessitated because of my current preexisting case obligations. In addition, pursuant to § 50-k of the New York General Municipal Law, the Corporation Counsel's Office must determine, on a review of the facts of the case, whether we may represent Jimmy Ahn; Neramati Jagdeo; and Joseph Scalisi. The individually named defendants must also decide whether they wish to be represented by the Office of the Corporation Counsel. If so, we must obtain their written authorization and make a decision as to how to proceed in the case. Accordingly, to permit the foregoing, and without appearing at this time on behalf of defendants Jimmy Ahn; Neramati Jagdeo; and Joseph Scalisi, this Office also asks that the Court extend the deadline

¹ City Defendants do not know whether all purported Defendants have been properly served.

correspondingly, to August 26, 2024, for their respective responses to the Complaint. An extension of time would avoid filing a piecemeal answer in this case.

Accordingly, for the reasons set forth above, I respectfully seek a 60-day extension of time to respond to the Complaint on behalf of all Defendants until August 26, 2024.

I thank the Court for its attention and consideration of this request.

Respectfully submitted,


/s/ Elisheva L. Rosen
Elisheva L. Rosen
Assistant Corporation Counsel

cc: Daniela Nanu (by ECF)
Law Office of Daniela Nanau, P.C.
89-03 Rutledge Ave
Glendale, NY 11385
dn@danielananau.com

Honorable Katharine H. Parker (by ECF)
United States Magistrate Judge

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', is written over a horizontal line.

Hon. Ronnie Abrams
June 18, 2024